

PHILLIP A. TALBERT
United States Attorney
KEVIN C. KHASIGIAN
Assistant U.S. Attorney
501 I Street, Suite 10-100
Sacramento, CA 95814
Telephone: (916) 554-2700

Attorneys for the United States

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

APPROXIMATELY 10.19321397
BITCOIN,

Defendant.

2:21-CV-02353-JAM-DB

UNITED STATES' REQUEST TO
EXTEND THE DEADLINE TO
SUBMIT A JOINT STATUS REPORT
FROM MARCH 18, 2022 TO MAY 18,
2022

The United States submits the following Request to Extend the Deadline to file a Joint Status Report from March 18, 2022 to May 18, 2022.

Introduction

On December 17, 2021, the United States filed a civil forfeiture complaint *in rem* against the above-captioned asset ("defendant cryptocurrency") based on its involvement in violations of wire fraud. All known potential claimants to the defendant cryptocurrency were served in a manner consistent with *Dusenbery v. United States*, 534 U.S. 161, 168 (2002) and the applicable statutory authority. Additionally, public notice on the official internet government forfeiture site, www.forfeiture.gov, began on January 8, 2022, and ran for thirty consecutive days, as required by Rule G(4)(a)(iv)(C) of Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions.

1 The last day to file a claim based on the publication was March 9, 2022.

2 **Good Cause**

3 To date, the United States has diligently pursued its forfeiture case against the defendant
4 cryptocurrency and attempted to notice all known potential claimants as required by the Supplemental
5 Rules governing forfeiture cases. Specifically, the United States sent copies of the complaint documents
6 to potential claimant Caroline Hepworth via certified and first-class mail and personal service of the
7 complaint documents. The United States sent copies of the complaint documents to potential claimant
8 Binance by international Federal Express and email. Clerks Certificates of Entry of Default were filed
9 on March 15, 2022, against Caroline Hepworth and Binance.

10 On March 10, 2022, the Court entered an Order Permitting Direct Notice of Complaint for
11 Forfeiture by Email. On March 10, 2022, the United States sent copies of the complaint documents to
12 potential claimant Tarun Kumar Arora via email. No party has entered this case.

13 The extension of time will allow the time period to run for any potential claimants to file a claim.
14 Given the current state of the case, the United States anticipates moving for default judgment if no
15 claims are filed.

16 Thus, there is good cause to extend the deadline to file a joint status report in this case from
17 March 18, 2022 to May 18, 2022, or to a date the Court deems appropriate.

18
19 Dated: 3/15/2022

PHILLIP A. TALBERT
United States Attorney

20
21 /s/ Kevin C. Khasigian
KEVIN C. KHASIGIAN
Assistant U.S. Attorney
22
23
24
25
26
27
28